



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278

March 17, 2025

**BY CM/ECF**

The Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Keonne Rodriguez and William Lonergan Hill, 24 Cr. 82 (RMB)***

Dear Judge Berman:

The parties write to provide the Court with a status update in the above-referenced case in advance of the pretrial conference scheduled for March 18, 2025.

Since the last update to the Court on December 10, 2024 (Docket No. 63), the Government produced four additional batches of discovery on December 10, 2024 (Batch 5) and February 3, 2025 (Batch 6), March 5, 2025 (Batch 7), and March 14, 2025 (Batch 8). These batches of discovery have been largely comprised of the identified data from the FBI and IRS-CI's review of electronic devices that were seized from Rodriguez and Hill during their arrests, as well as additional law enforcement records and publicly available information that the Government has obtained as part of its ongoing investigation.

As the Court may recall, one of the largest volumes of discovery in this case related to approximately 44 electronic devices seized from Defendant Keonne Rodriguez's residence in Pittsburgh. Of those devices, the Government has been able to access the data on approximately 18 of those devices.<sup>1</sup> Identified data from those devices has recently been produced to defense counsel, and the Government is still trying to decrypt the remaining devices and will produce identified data to the defendants on a rolling basis. For example, a hard drive on one of the laptops was just recently decrypted on or about March 13, 2025, and so law enforcement agents will be reviewing that device after it undergoes a filter review. Aside from this recently decrypted hard drive, the Government has produced all of the Rule 16 materials in its possession to date. The Government will continue producing Rule 16 materials on a rolling basis moving forward as it continues its investigation. Defendants are still assessing the voluminous discovery received to date.

---

<sup>1</sup> Of the remaining 26 devices, it appears that four items are damaged and 10 items have no data present.

Page 2 of 2

On March 16, 2025, the Government also received from the defendants a 12-page single-spaced letter demanding the production of approximately 63 items. The Government is carefully reviewing this letter and plans to respond to defense counsel as appropriate within the next 30 days.

On March 11, 2025, the defendants sent the Government a demand for a bill of particulars. On March 17, 2025, the Government provided a written response to the defendants' request for a bill of particulars.

At the Court's upcoming status conference, the parties will be prepared to discuss a schedule for pretrial motions.

Respectfully submitted,

MATTHEW PODOLSKY  
Acting United States Attorney

By: /s/ Andrew K. Chan

Andrew K. Chan  
David R. Felton  
Cecilia Vogel  
Assistant United States Attorneys  
Tel: (212) 637-1072 / 2299 / 1084

cc: Michael Krouse, Esq. (Counsel for Defendant Keonne Rodriguez)  
Roger Burlingame, Esq. (Counsel for Defendant William Lonergan Hill)